

May 19, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Rural Health Care Support Mechanism, WC Docket No 02-60
Actions to Accelerate Broadband-Enabled Health Care Solutions, GN Docket No 16-46

Dear Chairman Pai and FCC Commissioners:

Thank you for your support of the Rural Health Care Program. As you recognized in a recent Senate Commerce Committee FCC Oversight hearing, broadband telemedicine is a critical component of addressing the health care needs of Alaskans.

Tanana Chiefs Conference is organized as Dena' Nena' Henash or "Our Land Speaks"; an Alaska Native non-profit corporation, charged with advancing Tribal self-determination and enhancing regional Native unity. We provide services to 42 communities of which 37 are federally recognized tribes. Our work is balancing traditional Athabascan and Alaska Native values with modern demands in the areas of health services, cultural and natural resources, and tribal development. TCC works closely with our tribes to carry out our mission.

Telemedicine has allowed Tanana Chiefs Conference to dramatically improve access to care, accelerate diagnosis and treatment, avoid unnecessary medivacs and expand local treatment options in 30 of our communities. It has also helped reduce Medicaid costs. In our region, we rely on satellite transmission circuits. We have utilized this to go electronic with our medical records and telehealth systems. Our primary and specialty clinic support is in Fairbanks, Alaska which is 413 miles from our farthest clinic in Holy Cross. We rely on these network circuits to ensure our patients get the best care possible. Our clinical staff, the primary care doctors and specialty doctors can now see in real time what is being entered into the patients' medical record. This has greatly improved medication management, reduced hospital re-admittance, increased patient safety and brings a sense of security for all who manage the patients' care.

However, the current \$400 million Rural Health Care Universal Service Support budget remains at the initial level set in 1997, despite inflation, advances in technology, and increased demand for services. The Universal Service Administrative Committee also recently announced that it

exceeded the funding cap for the current 2016 fiscal year ending June 30, 2017. Applicants that filed during the Sept. 1 - Nov. 30, 2016 filing window will receive a pro-rated percentage, 92.5 percent, of the qualifying funding requested. In our case, that means we will be responsible for paying an additional **\$387,680.61**, which we did not budget or anticipate, in addition to the portion of the cost of services that we are already responsible for paying under the rules of the rural health care support mechanism.

We cannot raise our service rates to compensate for this increase in costs for our network circuits. This will directly impact our patient programs in cuts to personnel, programs, and direct health services. We will have to use already underfunded Indian Health Service and Health Resources and Services Administration federal grant funds to pay for the increases.

We ask that you take steps to ensure both the near and long-term viability of the Rural Health Care Program to meet the increased demand for telemedicine services both in Alaska and across the country. We believe that the FCC should increase the budget for the rural health care support mechanisms to reflect inflation over the past two decades, as well as increased technology and telecommunications demands due to our HIPAA legal obligations, advances in telemedicine capabilities, changes in patient expectations and standards of care.

In addition, please consider implementing an inflation adjustment mechanism, similar to what is in place for the educational rate, for the future, and short-term measures to restore qualifying funding requests filed Sept. 1 - Nov. 30, 2016 to 100 percent.

Thank you for your support of this important program.

Sincerely,
Tanana Chiefs Conference



Victor Joseph,
President/Chief

CC:

The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young